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March 6, 2023

**DELIVERED VIA ECF**

The Honorable Sarah Netburn  
Thurgood Marshall Courthouse  
40 Foley Square, Courtroom 219  
New York, NY 10007

**Case Title:** *Freeman v. Deebs-Elkenaney et al,*  
**1:22-cv-02435-LLS-SN**  
**Re:** **Request for Leave to File Reply Brief**

Your Honor:

Plaintiff, Lynne Freeman, writes to respectfully request leave to file a reply brief in response to Defendants' opposition. (Dkt. #149.) Here, Defendants included multiple declarations with their opposition. (Dkts. #150-151.) Plaintiff believed that due to Your Honor's Individual Rule II.C, which limits discovery letters to five pages, that such declarations were not permitted without advanced permission (as Defendants seemed to request and obtain when they requested an extension of time from this Court to secure and file declarations with their response letter brief).

In her initial letter, Plaintiff previously sought "permission to file a formal motion with supporting declarations and exhibits." (Dkt. #132.) Given Defendants' counter-filings, it is now clear that such declarations and exhibits are necessary to properly address the technical assertions raised by Defendants in their respective declarations, including but not limited to about the missing Message-ID and the reasonableness and accessibility of the ESI at issue. Plaintiff further requests that should the Court grant her request, that she is given five business days to file the requested materials.

We thank Your Honor for consideration of this matter.

Respectfully submitted,

By: /s/ Laura M. Zaharia  
Scott Alan Burroughs  
Laura M. Zaharia  
DONIGER / BURROUGHS  
For the Plaintiff